

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ALVIN GREENBERG, MICHAEL  
STEINBERG, JULIE HANSON, CHRISTINA  
KING, and RONNELL ROBERTSON, on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,  
Defendant.

No. 2:21-CV-00898-RSL

**JOINT STATUS REPORT AND  
STIPULATED MOTION**

NOTE ON MOTION CALENDAR:  
February 10, 2025

1. On October 4, 2024, the Court entered an Order Setting Trial Date and Related Dates. Dkt. 69. In that Order, the Court set a November 4, 2024 deadline for the parties to agree on custodians, search terms, and structured data, or to submit to the Court outstanding disputes on these issues. *Id.* at 1.

2. On December 4, 2024, Amazon filed a Motion for Protective Order regarding the range of products to be covered by its structured data productions. Dkt. 78. That motion was noted for December 18, 2024 and is fully briefed. *See* Dkt Nos. 83 (Response) and 85 (Reply).

3. Through stipulations previously so-ordered by the Court (Dkt. Nos. 84 & 90), the Parties agreed to extend the deadlines for negotiating custodians and search terms until January 24, 2025. The Parties also agreed to extend the deadline for negotiating structured data until February 10, 2025.

4. The Parties reached agreement on custodians and search terms by the January 24, 2025 deadline, subject to appropriate reservations of rights.

5. The Parties have also made substantial progress negotiating parameters for Amazon's structured data productions, significantly narrowing areas of dispute. Negotiations are ongoing and concern multiple datasets potentially bearing on the claims and defenses in this action. Given the complexities involved, the Parties believe that additional time to fully negotiate data parameters is warranted and will help minimize, if not eliminate, disputes requiring judicial involvement.

6. The Parties accordingly jointly move to extend from February 10, 2025 to March 3, 2025 the deadline for agreement or presentation of disputes regarding structured data. The Parties also move to extend the deadline for production of structured data from April 11, 2025, to May 2, 2025.

7. Datasets will be produced on a rolling basis as they are ready for production.

8. The Parties are not at this time requesting any further extensions to case deadlines.

IT IS SO STIPULATED

DATED: February 10, 2025

Respectfully submitted,

/s/ John A. Goldmark

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21 DATED: February 10, 2025

Respectfully submitted,

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**[PROPOSED] ORDER**

The Court GRANTS the Parties' stipulated motion. The deadline for the Parties to agree on custodians, search terms, and structured data, or to present disputes on those issues, is extended to March 3, 2025. The deadline for production of structured data is extended to May 2, 2025.

SO ORDERED this \_\_\_\_ day of February, 2025.

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Robert S. Lasnik  
United States District Judge